

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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LUZ A. ESPAILLAT,

v.

Plaintiff,

**Docket No.:**

**NOTICE OF REMOVAL**

WILLIAM M. RITTER, CONTRACT  
FREIGHTERS and JOHN DOE (1-10) a  
person, corporation, sole proprietorship,  
partnership, limited liability company, and/or  
limited liability partnership whose identity is  
presently unknown, jointly and severally  
together with interest and costs of suit.

Defendants.  
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**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Defendants, WILLIAM M. RITTER and CONTRACT FREIGHTERS, INC. s/h/a  
CONTRACT FREIGHTERS, hereby removes this action from the Superior Court of the  
State of New Jersey, Bergen County, to the United States District Court for the District of  
New Jersey.

1. A civil action has been brought against Petitioner in the Superior Court  
of the State of New Jersey, Essex County, which is entitled Luz A. Espailat v. William M.  
Ritter, Contract Freighters and John Doe (1-10) under Docket Number BER-L-3233-21.  
A copy of the Summons and Complaint is annexed hereto as Exhibit "A". Upon  
information and belief, defendant WILLIAM M. RITTER, received notice of this action no  
earlier than June 4, 2021 and defendant CONTRACT FREIGHTERS, INC. s/h/a  
CONTRACT FREIGHTERS, received notice of this action no earlier than June 11, 2021.

2. The above described action is one in which the Court has original jurisdiction under the provisions of 28 U.S.C. §1332, and is one which may be removed to this Court by Petitioner herein pursuant to the provisions of 28 U.S.C. §1332(a)(2) and (c)(1) and 28 U.S.C. §1441, in that it is a civil action between an individual who is a citizen and resident of one state and an individual who is a citizen and resident of a foreign state and a corporation which is incorporated and has its principal place of business in a foreign state. Upon information and belief, the matter in controversy exceeds the sum of \$75,000 exclusive of interest and costs.

3. Upon information and belief, at the time of the commencement of this action and at the filing of this Notice of Removal:

(a) Plaintiff Luz E. Espallat is a citizen and resident of the state of New Jersey;

(b) Defendant William M. Ritter is a natural person who is a citizen and resident of the state of Georgia, whose address is 11 Saddle Field Cir. NW, Cartersville, GA 30121;

(c) Defendant, CONTRACT FREIGHTERS, INC. s/h/a CONTRACT FREIGHTERS, is a corporation organized and existing under the laws of Missouri, and is a citizen of the State of Missouri, with its principal place of business located at 4701 E. 32<sup>nd</sup> Street, Joplin, MO 64804.

4. Plaintiff seeks money damages for alleged negligence for personal injuries allegedly resulting from a motor vehicle accident that allegedly took place on or about July 11, 2019 at or near 42 Passaic Street, Wood-Ridge, in Bergen County, New Jersey. It is alleged that plaintiff Luz E. Espallat sustained serious personal injuries, incurred expenses for hospital and medical attention, and has suffered and will in the future suffer pain and permanent disability.

5. Upon information and belief, the damages claimed are sufficient to meet the jurisdictional minimum amount in controversy.

6. Defendants have annexed hereto a copy of all process pleadings and orders sent to defendants in the state court action, pursuant to 28 U.S.C. § 1446(a).

7. Defendants/petitioners will promptly file a copy of this Notice in the Superior Court of the State of New Jersey, Bergen County and will serve a copy of same on the plaintiff and all parties in accordance with 28 U.S.C. §1446(d).

**WHEREFORE**, Defendants, WILLIAM M. RITTER and CONTRACT FREIGHTERS, INC. s/h/a CONTRACT FREIGHTERS, respectfully request that the action pending against it in the Superior Court of the State of New Jersey, Bergen County, be removed therefrom to this Court.

Dated: July 2, 2021

STRONGIN ROTHMAN & ABRAMS, LLP  
Attorneys for Defendants  
WILLIAM M. RITTER and CONTRACT  
FREIGHTERS, INC. s/h/a CONTRACT  
FREIGHTERS  
70 South Orange Avenue, Suite 215  
Livingston, NJ 07039

*s/Barry S. Rothman*

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BARRY S. ROTHMAN, ESQ. (BR4639)

TO:

DEGRADO LAW, LLC  
Attorneys for Plaintiff  
250 Moonachie Road, Suite 200  
Moonachie, NJ 07074  
Tel.: 201-678-9007  
Fax: 201-678-2875